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13 TRAVIS KALANICK

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 WAYMO LLC,
18 Plaintiffs,
19 v.
20 UBER TECHNOLOGIES, INC.;
21 OTTOMOTTO, LLC; OTTO TRUCKING
22 LLC,
23 Defendants.

Case No.: 17-cv-00939-WHA

**DECLARATION OF ROBERT L.
URIARTE IN SUPPORT OF MR.
KALANICK'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

1 I, Robert L. Uriarte, hereby declare:

2 1. I am a member of the bar of the California State Bar, admitted to practice before this
3 Court, and am an associate with the law firm of Orrick, Herrington & Sutcliffe LLP ("Orrick"),
4 counsel for Travis Kalanick. I have personal knowledge of the facts stated in this declaration,
5 except as to those facts stated on information and belief, which I believe to be true. I could and
6 would testify competently to the matters stated herein.

7 2. Mr. Kalanick's counsel and Waymo's counsel agreed that the contents of an August 4,
8 2017 discussion between their respective forensics experts would be treated as confidential, and
9 this confidentiality agreement was a condition precedent to the discussion.

10 3. The following portions of Mr. Kalanick's Opposition and supporting materials recount
11 the content of the August 4, 2017 discussion that Waymo and Mr. Kalanick's counsel agreed to
12 treat as confidential:

Document	Text to be Sealed
Opposition Letter Brief	Page 2, first paragraph: text from after the word "produce" to the word "that" in the first complete sentence Page 2, second paragraph: text from after the word "production" to the word "that" in the third sentence.
Declaration of Allan T. Vogel	Page 4, the entirety of Paragraph 13

19
20 I declare under penalty of perjury under the laws of the United States that the foregoing is
21 true and correct. Executed on this 10th day of August, 2017 at Menlo Park, California.

22
23 

24 Robert L. Uriarte